

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF HOME)	
ENERGY ASSISTANCE PROGRAMS OFFERED)	CASE NO.
BY INVESTOR-OWNED UTILITIES PURSUANT TO)	2019-00366
KRS 278.285(4))	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO COMMUNITY ACTION KENTUCKY, INC.

Community Action Kentucky, Inc. (CAK), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due on February 14, 2020. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

CAK shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when

made, is now incorrect in any material respect. For any request to which CAK fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, CAK shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to CAK's Response to Commission Staff's First Request for Information (Staff's First Request), Attachment A, page A-2, which recommends that crisis-styled programs move to an individual utility-based program instead of a collective fund. Explain the source of the funds that are in the "pool" of funds and provide additional information regarding what is involved in "maintaining" the "pool" of funds.

2. Refer to CAK's Response to Staff's First Request, Attachment A, page A-3, which recommends that, instead of recertifying recurring payment HEA program participants, the waitlist be dropped and re-enrollment conducted. If this recommendation was implemented, explain whether CAK or other agencies that administer HEA programs would incur increased expense and, if so, provide an estimate of the average expense to re-enroll eligible participants.

3. Refer to CAK's Response to Staff's First Request, Attachment A, page A-4, which recommends that the utility be responsible for determining and applying the amount of credit for eligible recurring payment HEA program participants. Explain in specific detail the logistics and staff time involved when an administering agency determines and applies the amount of monthly credit for program participants.

4. State the specific percentage of income guideline that CAK would recommend be implemented for crisis style and for recurring payment HEA programs, and explain why CAK recommends that income guideline.

5. Refer to CAK's Response to Staff's First Request, Attachment A, page A-4, which recommends that recurring payment HEA programs use a consistent method to determine the fixed monthly benefits. State the methodology that CAK recommends be implemented for determining fixed monthly benefits for recurring payment HEA programs and explain why CAK recommends this methodology.

6. Refer to CAK's Response to Staff's First Request, Attachment A, page A-5, which recommends that legal fees be included in fees paid to agencies administering HEA programs on behalf of utilities. Provide an estimate of the type and amount legal fees that CAK recommends be included in fees paid to administering agencies.

7. State whether CAK discussed its recommendations with Affordable Energy Corporation or the Association of Community Ministries, both located in Jefferson County, Kentucky.

8. For the various programs that CAK are aware, explain whether HEA benefits are prioritized or provided before or after other available benefits, such as LIHEAP, donations, or other programs aimed at reducing consumers' energy burdens.

9. Refer to Attachment 1, page 3 of 5, to Kentucky Power's response to Staff's Second Request for Information, Item 3. Explain the difference and disparity between the "allocated" and "used" totals for the separate community action agencies. For example, Gateway and LKLP used all, or nearly all, of their allocated slots, while Big Sandy has used less than 25% of their allocated slots.

10. Refer to Attachment A to CAK's response to Staff's First Request, Item 3, page A-2.

a. Elaborate on the first two bullet points under "Client Prioritization," including providing examples.

b. Explain the line under "Client Prioritization" that states, "Evaluate modifying eligibility prioritization systems so that they are not weighted to household reporting zero income."

c. Elaborate on what CAK means in discussing a "mechanism to adjust eligible ratepayer prioritization rules."

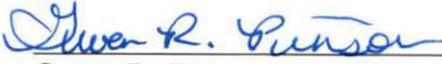
11. Explain the WinterCare program.

12. For each HEA program, provide the following information for each of the last five full program years:

a. The average monthly bill for all residential customers for each month from November to March.

b. The average monthly bill for residential customers receiving HEA benefits for each month from November to March.

c. The average monthly bill for residential customers receiving LIHEAP benefits for each month from November to March



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **JAN 31 2020**

cc: Parties of Record

*Honorable Allyson K Sturgeon
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Kentucky-American Water Company
Kentucky-American Water Company
2300 Richmond Road
Lexington, KY 40502

*Karen Greenwell
Attorney
Wyatt, Tarrant & Combs, LLP
250 West Main Street
Suite 1600
Lexington, KENTUCKY 40507-1746

*L Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*Hector Garcia
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Post Office Box 16631
Columbus, OHIO 43216

*Kathie McDonald-McClure
Attorney
Wyatt, Tarrant & Combs, LLP
2600 PNC Plaza
500 West Jefferson Street
Louisville, KENTUCKY 40202

*Brooke Wancheck
Asst. Counsel
Columbia Gas of Kentucky, Inc.
2001 Mercer Road
P. O. Box 14241
Lexington, KY 40512-4241

*John B Brown
Chief Financial Officer
Delta Natural Gas Company, Inc.
3617 Lexington Road
Winchester, KY 40391

*Duke Energy Kentucky, Inc.
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45202

*Cheryl A MacDonald
Columbia Gas of Kentucky, Inc.
290 W. Nationwide Blvd.
Columbus, OHIO 43215

*Jenny Lowery
Delta Natural Gas Company, Inc.
3617 Lexington Road
Winchester, KY 40391

*Lindsey Ingram
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Christen M Blend
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Post Office Box 16631
Columbus, OHIO 43216

*Judy M Cooper
Director, Regulatory Services
Columbia Gas of Kentucky, Inc.
2001 Mercer Road
P. O. Box 14241
Lexington, KY 40512-4241

*Lawrence W Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*David S Samford
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*Justin M. McNeil
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Minna Sunderman
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Debbie Gates
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Kentucky Power Company
Kentucky Power Company
855 Central Avenue, Suite 200
Ashland, KY 41101

*Monica Braun
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Honorable Mark R Overstreet
Attorney at Law
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

*Sara Judd
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Columbia Gas of Kentucky, Inc.
Columbia Gas of Kentucky, Inc.
290 W Nationwide Blvd
Columbus, OH 43215

*Sidney Gates
Community Action Kentucky
101 Burch Court
Frankfort, KENTUCKY 40601

*Delta Natural Gas Company, Inc.
Delta Natural Gas Company, Inc.
3617 Lexington Road
Winchester, KY 40391

*Kentucky Utilities Company
Kentucky Utilities Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

*Rick E Lovekamp
Manager - Regulatory Affairs
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Louisville Gas and Electric Company
Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

*Robert Conroy
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Rocco O D'Ascenzo
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Roger McCann
Executive Director
Community Action Kentucky
101 Burch Court
Frankfort, KENTUCKY 40601